

March 7, 2014

**Letter – Expression of Interest
VIA ECFS**

Chairman Thomas Wheeler
Commissioner Mignon Clyburn
Commissioner Jessica Rosenworcel
Commissioner Ajit Pai
Commissioner Michael O’Rielly
Jonathan Chambers
Federal Communications Commission
445 12th Street, SW 20024
Washington, DC

**Re: Expression of Interest – Rural Broadband Experiments
Connect America Fund, WC Docket No. 10-90**

Dear Chairman Wheeler, Commissioners, and Mr. Chambers,

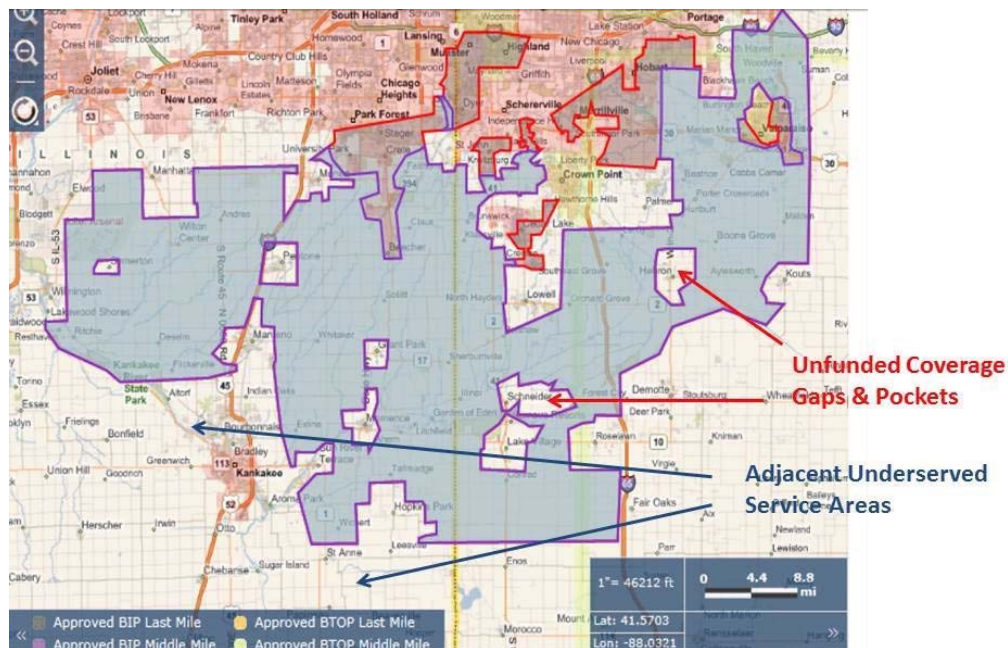
This letter is to express ConVergence’s interest in receiving funding from the Rural Broadband Experiments announced at the January 30th FCC Open Meeting.

Background

ConVergence is a technology and telecommunications infrastructure services provider that through its Apex9, MitoTec and IPpay product lines to provide a combination of hardware infrastructure, broadband access, voice-over-ip, credit card processing and cloud computing services to over 3,500 business and residential customers. In September 2010, ConVergence was awarded ~\$11.5 million dollars through the Rural Utilities Service Broadband Initiatives Program (BIP) to build the CTI Rural Open-Access WiMAX Network, a project that provided bundled broadband coverage to ~85,000 underserved residential households, businesses and community anchor institutions spanning over ~1,000 square miles in Northeast Illinois and Northwest Indiana. Outside the scope of this project, the State of Illinois Department of Commerce and Economic Opportunity (DCEO) also contributed an additional \$700,000 to ConVergence for additional job creation and infrastructure growth for underserved areas outside of the BIP funded service area that could benefit from increased job creation and infrastructure growth. Due to changes in the economy and public policy, the majority of the allocated DCEO money was never collected, and the project to build-out advanced broadband services to these underserved areas never occurred. Since building out this initial network, ConVergence has identified a variety of additional neighboring areas and communities that it could leverage its network to provide broadband availability.

Geographic Territory

ConVergence received BIP funding to build-out broadband services in underserved areas in Cook, Kankakee and Will County in Illinois and Lake, Newton and Porter County in Indiana. A combination of tight application deadlines, a lack of quantifiable broadband mapping data and the nature of the Round 2 stimulus funding “challenge process” resulted in a final funded service area containing large pockets of unfunded coverage areas (see below).



In the years following the award, ConVergence has gained additional market intelligence and has identified an additional number of areas adjacent to its BIP funded network that meet the needs of the FCC’s definition of “underserved”



Eligible Telecommunications Carrier (ETC) Status.

ConVergence is recognized by the Illinois Public Utilities Commission as an Eligible Telecommunications Carrier.

Illinois Commerce Commission 527 East Capitol Avenue, Springfield, Illinois 62701		<input type="text"/>	<input type="button" value="Search"/>	Advanced
Consumers		Public Utility	Transportation	About ICC
ICC ► Utilities and Providers ►				
Public Utility Profile				
Convergence Technologies, Inc. Activated: September 8, 2011				
Authority & Officers		Compliance Filings		
Public Utility - Cellular/Mobile Telephone Activated: 11-0418 September 8, 2011 The latest designated agent form was accepted January 9, 2014. No annual report information is available at this time. A tariff has not been filed.				
Public Utility - Inter-Exchange Carrier (IXC) Activated: 11-0418 September 8, 2011 The latest designated agent form was accepted January 9, 2014. The latest annual report was accepted April 1, 2013. The initial tariff filing was made December 8, 2011.				
Public Utility - Local Exchange Carrier (LEC) Activated: 11-0418 September 8, 2011 The latest designated agent form was accepted January 9, 2014. The latest annual report was accepted April 1, 2013. The initial tariff filing was made December 8, 2011.				
Public Utility - Interconnected VoIP Service Provider Activated: December 23, 2011 No designated agent form information is available at this time. No annual report information is available at this time. A tariff has not been filed.				

Proposed technology

ConVergence utilized a combination of fixed and nomadic broadband wireless technologies as a platform to cost-effectively deliver broadband to the proposed funded service area. Voice-over-IP and IPpay Payments technology were bundled with “dump-pipe” broadband access to create additional demand and value for subscribers.

ConVergence would utilize and extend the same technology platform in order to leverage its existing BIP funded infrastructure.

State and/or Local or Tribal Government Participation in and/or Support for Project

ConVergence was the only RUS BIP project in the entire state of Illinois to get financial support through



the Illinois Broadband Development Council and the State of Illinois' Department of Commerce and Economic Opportunity. Throughout its RUS BIP build-out process, ConVergence has collaborated with local governmental and tribal organizations to gain right-of-way access and permitting for the construction of necessary telecommunications facilities.

Thank you for considering our Expression of Interest in your decision about the amount of funding that will be allocated in the Rural Broadband Experiments. We commend the FCC in this effort to connect rural communities and are ready to help you close the digital divide.

Sincerely,

Charles Wu
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